

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-  
GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE  
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,  
THE TRUSTEES OF COLUMBIA UNIVERSITY IN  
THE CITY OF NEW YORK, CORNELL  
UNIVERSITY, TRUSTEES OF DARTMOUTH  
COLLEGE, DUKE UNIVERSITY, EMORY  
UNIVERSITY, GEORGETOWN UNIVERSITY, THE  
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU  
LAC, THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**PLAINTIFFS' MOTION TO SEAL THEIR MOTION TO CHALLENGE CERTAIN  
IMPROPER CONFIDENTIAL AND ATTORNEYS' EYES ONLY DESIGNATIONS BY  
DEFENDANTS CORNELL, GEORGETOWN, AND PENN UNDER THE SECOND  
AMENDED CONFIDENTIALITY ORDER (ECF 608)**

Pursuant to the Second Amended Confidentiality Order (ECF No. 608), and Local Rule 26.2, Plaintiffs respectfully request that the Court grant this Motion to File Under Seal their Motion to Challenge Certain Improper Confidential and Attorneys' Eyes Only Designations by Defendants

Cornell, Georgetown, and Penn Under the Second Amended Confidentiality Order (ECF 608). In support of their Motion, Plaintiffs state as follows:

1. The motion at issue discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order.

2. Under the Second Amended Confidentiality Order (ECF No. 608) ¶ 10(b), and in accordance with Local Rule 26.2(c), Plaintiffs are provisionally filing the entire filing under seal and will cause an unredacted copy of the filing to be served upon all Parties. Within seven days, the party who produced any implicated Confidential Information under the Second Amended Confidentiality Order may file a motion to seal. If the motion to seal is granted, Plaintiffs will file a redacted (public) version within 14 days. If no motion to seal is filed or if the motion to seal is denied, Plaintiffs will file an unredacted version of the initial filing within 14 days.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' motion.

Dated: March 19, 2024

/s/ Robert D. Gilbert

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Respectfully Submitted,

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